

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NORTH DAKOTA

In re:)	Case No. 25-30002
)	(Chapter 11)
GENERATIONS ON 1ST, LLC)	
)	
Debtor)	
_____)	
)	
In re:)	Case No. 25-30003
)	(Chapter 11)
PARKSIDE PLACE, LLC)	
)	
Debtor)	
_____)	
)	
In re:)	Case No. 25-30004
)	(Chapter 11)
THE RUINS, LLC)	
)	
Debtor)	(Joint Administration Motion Pending)
_____)	

**DECLARATION IN SUPPORT OF APPLICATION TO
APPROVE EMPLOYMENT OF MAURICE B. VERSTANDIG,
CHRISTIANN CATHCART, AND THE DAKOTA BANKRUPTCY FIRM AS
GENERAL REORGANIZATION COUNSEL TO ABOVE-CAPTIONED DEBTORS**

1. My name is Maurice VerStandig, I am over the age of eighteen, and I am competent to testify to the matters set forth herein.

2. I am an attorney licensed to practice before the highest courts of the District of Columbia, the State of Nevada, the State of Maryland, the Commonwealth of Virginia, and the State of Florida; as well as before the United States District and Bankruptcy Courts for the District of North Dakota, the District of Columbia, the District of Maryland, the Eastern District of Virginia, the Western District of Virginia, the Northern District of Florida, the Middle District of Florida, the Southern District of Florida, the District of Nevada, the Western District of Wisconsin, the District of Colorado, the District of Nebraska, the Southern District of Illinois, the Central

District of Illinois, the Eastern District of Oklahoma, and the Eastern District of Missouri; as well as before the Supreme Court of the United States; as well as before the United States Courts of Appeal for the District of Columbia Circuit, the Fourth Circuit, the Eleventh Circuit, and the Ninth Circuit; as well as before the United States Tax Court.

3. Christianna Cathcart (“Ms. Cathcart”) is an attorney licensed to practice before the highest court of the State of North Dakota as well as before the United States District and Bankruptcy Courts for the District of North Dakota and the Eastern District of Oklahoma. She is currently admitted, *pro hac vice*, in two cases pending before the United States Bankruptcy Court for the District of Columbia.

4. I am a graduate of the University of Wisconsin-Madison (BA with honors, 2006) and the University of Miami School of Law (JD *cum laude*, 2009).

5. Ms. Cathcart is a graduate of the University of Winnipeg (BA, 2019) and the University of North Dakota School of Law (JD, 2023).

6. I am *not* a member of the State Bar Association of North Dakota, though I am admitted to practice before this Honorable Court.

7. Ms. Cathcart is a member of the State Bar Association of North Dakota and is admitted to practice before this Honorable Court.

8. I maintain, within the State of North Dakota, a mailing address of 1630 1st Avenue N, Suite B PMB 24, Fargo, North Dakota 58102.

9. I do *not* occupy office space in the State of North Dakota, am not a resident of the State of North Dakota, and use the foregoing address solely as a locale for the receipt of mail. I primarily reside in the State of Maine, though the majority of my bankruptcy-centric law practice

is in the District of Columbia and this Honorable Court which, in turn, leads me to travel to both locales on a regular basis.

10. Ms. Cathcart does reside within the State of North Dakota, though she does not occupy formal office space therein.

11. I am the sole member of The VerStandig Law Firm, LLC, a Maryland limited liability company. “The Dakota Bankruptcy Firm” is a registered trade name of The VerStandig Law Firm, LLC, as is “The Belmont Firm,” with the former trade name being used for work in and around North Dakota and the latter trade name being used for purposes of handling debtor-side work in the Washington, DC metropolitan area. The VerStandig Law Firm, LLC trades under its formal name when managing creditor-side work in the Washington, DC metropolitan area and when managing cases in other jurisdictions.

12. The majority of my legal practice is dedicated to the representation of parties in bankruptcy proceedings and related adversary cases, including (i) the representation of debtors in Chapter 11 cases; (ii) the representation of asset-based lenders in their capacity as creditors in Chapter 11 cases; (iii) the representation of consumers in Chapter 7 and Chapter 13 cases; and (iv) the periodic representation of trustees.

13. I serve as a coordinating editor of the American Bankruptcy Institute Journal, am the co-chair of the American Bar Association section on Subchapter V bankruptcies, co-host an American Bar Association podcast on Subchapter V bankruptcies, have served on the Local Rules committee of the United States Bankruptcy Court for the District of Columbia since 2020, and regularly publish articles on developments in bankruptcy law.

14. I represent no other entity in connection with this case and am disinterested as that term is defined in 11 U.S.C. §101(14). I (i) am not a creditor, an equity security holder, or an

insider of any of the debtors; (ii) am not and was not, within two years before the date of filing of the petition for relief, a director, officer or employee of any of the debtors; and (iii) do not have an interest materially adverse to the interest of the estates or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the debtors, or for any other reason. Further, I hold no interest adverse to the interest of the debtors.

15. Excepting my representation herein and my furnishing the debtors with bankruptcy-centric pre-filing legal advice, I have no connection with the debtors, the debtors' creditors, any other party in interest, their respective attorneys, the United States Trustee, or any person employed in the office of the United States Trustee, except as disclosed below.

16. As of the filing of this declaration, I do not reasonably believe any of the debtors to hold claims materially adverse to one another. Should there come a time when it appears otherwise, and should it appear such claims should reasonably be investigated and/or pursued, I will work with the correlative debtor(s) to engage special conflicts counsel to address such claims.

17. All facts contained in the application to which this declaration is affixed are true and correct to the best of my knowledge.

I, Maurice VerStandig, pursuant to Section 1746 of Title 29 of the United States Code, do hereby declare, under the penalty of perjury, that I have personal knowledge of the matters set forth herein and the foregoing are true and correct.

Dated: January 6, 2025

By: /s/ Maurice B. VerStandig
Maurice B. VerStandig, Esq.